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BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Paper No. 1/3/05

Application Number: 09/526,754
Filing Date: March 16, 2000
Appellant(s): Hurt, Brett

Jeffrey G. Toler
For Appellant

EXAMINER'S ANSWER

This is in response to the appeal brief filed 11/22/04.

(1)   ***Real Party in Interest***

A statement identifying the real party in interest is contained in the brief.

(2)   ***Related Appeals and Interferences***

A statement identifying the related appeals and interferences which will directly affect or

be directly affected by or have a bearing on the decision in the pending appeal is contained in the

brief.

(3)   ***Status of Claims***

The statement of the status of the claims contained in the brief is correct.

(4)   ***Status of Amendments After Final***

The appellant's statement of the status of amendments after final rejection contained in

the brief is correct.

(5)   ***Summary of Invention***

The summary of invention contained in the brief is correct.

(6)   ***Grounds of Rejection to be Reviewed on Appeal***

The Appellant's statement of the Grounds of Rejection to be Reviewed on Appeal in the

brief is correct.

(7)   ***Claims Appealed***

The copy of the appealed claims contained in the Appendix to the brief is correct.

(8)   Prior Art of Record

The following is a listing of the prior art of record relied upon in the rejection of claims

under appeal.

5,933,811	Angles	8-1999
5,848,396	Gerace	12-1998
5,724,521	Dedrick	3-1998
6,480,894	Courts	11-2002

(9)   Grounds of Rejection

The following ground(s) of rejection are applicable to the appealed claims:

Claims 1-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Angles

(5,933,811) in view of Gerace (5,848,396) and in further view of Dedrick (5,724,521).

Claims 1, 10, 17, 21, 26: Angles discloses a system, method, server, medium for

providing personalized content to an e-commerce customer comprising:

a content management server that receives a query from a customer computer via a data network,

the query including the identity of a client and the identity of the e-commerce customer (col 3,

lines 45-54; col 3, lines 54-60; col 2, lines 54-58);

the content management server identifying personalized content to be displayed to the e-

commerce customer on the customer computer, wherein the personalized content is identified

based upon the identity of the client and the identity of the e-commerce customer (col 15, lines

20-31); and

the content management server returning a response to the customer computer via the data network that identifies the personalized content (col 15, line 65-col 16, line 7).

Angles further discloses a processor, memory, user interface, network interface (col 2, lines 45-59; col 9, line 35- col 10, line 42).

Angles further discloses a downloadable web page stored on a client web server comprising an image to be displayed on a customer computer (col 1, lines 33-44).

Angles further discloses retrieving an identity of the e-commerce customer if saved on the customer computer, creating an identity of the e-commerce customer if the identity of the e-commerce customer is not saved on the computer (col 10, line 60-col 11-line 50; col 14, lines 26-34; col 6, lines 58-66).

Angles further discloses the utilization of cookies on the user's computer to uniquely identify a consumer (col 17, lines 25-38; col 11, lines 1-5).

Angles does not explicitly disclose that the identity of the client is determined as apart from the identity of the consumer.

However, Gerace discloses that the identity of each user client as well as the user is determined and that the identity of the client and the identity of the user are utilized in targeting content (col 6, lines 13-21; Fig. 3C; col 6, lines 52-57; col 13, line 62-col 14, line 3).

Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made to add Gerace's identifying the consumer and the client to Angle's identifying the user via information on the user's computer. One would have been motivated to do this in order to allow Angles to send appropriate content based upon the capabilities or limitations of the client computer.

Also, Angles further discloses that information saved on a user computer has a limited

amount of time for use (col 11, lines 17-23).

Angles further discloses tracking consumer activity and responses (col 2, lines 45-50) and

sending content to a user based on the user's profile (col 3, lines 5-17) and that the sum of

customer's actions can be tracked (col 16, lines 39-45).

Angles further discloses a consumer computer with specialized code, that the consumer

id is stored on the consumer computer, that the advertisement data can be stored on the consumer

computer or with the content provider (col 10, line 19-col 12, line 11).

Angles does not explicitly disclose utilizing a session ID.

However, Gerace discloses tracking and profiling a user in order to provide targeted

content (col 2, lines 1-23). Gerace further discloses a session ID (col 6, lines 40-45; col 6, lines

60-65; col 6, line 45-col 7, line 23) and that the screen view and viewing times of each session

can be tracked (col 7, lines 13-23).

Gerace further discloses locally stored information identifying a user (col 13, lines 35-

38). Gerace does not explicitly disclose that the session ID is generated or stored on the user

computer.

However, it would have been obvious to one having ordinary skill in the art at the time

the invention was made to add Gerace's session ID to Angles locally stored user tracking and

targeting information. One would have been motivated to do this in order to provide Angles

with a further means of tracking user activities for targeting.

Additionally, Dedrick further discloses personalized content delivery code to be executed

by the customer computer (Fig. 2; col 6, lines 32-col 8, line 40; col 8, lines 1-5).

Dedrick further discloses that a session identifying information is generated on the

customer computer by the personalized content delivery code and stored on the customer

computer (Fig. 2; col 6, lines 32-col 8, line 40; col 8, lines 1-5). Note, that the local session

information and session identifying information is received by the metering server or content

management server and used in selecting content that is presented to the user (col 6, lines 64-68;

col 20, lines 55-59; col 19, lines 57-60).

Note that Angles discloses different configurations with locally stored user tracking

information (Fig. 4; Fig. 11), Gerace discloses the user utilizing the Internet anonymously (col

32, lines 52-57) and Dedrick discloses that information can not be placed on the server for user

privacy reasons (col 11, lines 45-50).

Therefore, it would have been obvious to one having ordinary skill in the art at the time

the invention was made to add Dedrick's locally operated session information tracking to

Gerace's session ID and session tracking and to add both of these features to Angles user

tracking and targeting with locally stored tracking and targeting information. One would have

been motivated to do this in order to track and target a user in a manner that is more private or

secure for that user.

Gerace further discloses a multitude of server and server clients (Fig. 1).

Angles further discloses a host of servers and a client-server architecture (col 5, line 61-

col 6, line 15) and that a Web browser can act as a client (col 5, line 65-col 6, line 3).

Angles nor Gerace does not explicitly disclose that the specific identity of the client

server servicing a customer is tracked.

However, Dedrick discloses that the client server serving a user is identified and tracked (Fig. 1; col 2, lines 54-col 3, line 28; col 14, line 52-col 15, line 5).

Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made to add Dedrick's identifying the consumer and the client serving the consumer to Angle's identifying the user via information on the user's computer. One would have been motivated to do this in order to allow Angles to send appropriate content based upon the client that serves a consumer.

Also, note that in addition to each of Angles, Gerace, and Dedrick disclosing targeting, profiling, and tracking a user, that each of Angles (col 2, lines 30-36), Gerace (col 2, lines 40-43), and Dedrick (col 9, lines 5-11) disclose users purchasing and e-commerce activities.

Claim 2, 11, 22, 27: Angles, Gerace, and Dedrick disclose the system, method, server, medium of claims 1, 10, 21, 26, and Angles further discloses that:

the query also includes a secondary identifier that relates to the client; and

the content management server also uses the secondary identifier to identify the personalized content (col 15, lines 20-31; col 15, line 65-col 16, line 7).

Additionally, Angles discloses numerous other identifiers that are related to the client and can be utilized for identifying personalized content (col 15, lines 20-31; col 15, line 65-col 16, line 7). Also, note that in Angles the advertising content can also be store locally (col 23, lines 27-35; Fig. 11, item 44). Hence, when the advertising content is stored locally, it is implied that advertising utilization information would come from a local source as well.

Claims 3, 12, 19, 23, 28: Angles, Gerace, and Dedrick disclose the system, method, server, medium of claims 1, 10, 17, 21, 26, and Angles further discloses that the identity of the personalized content corresponds to an image to be displayed to the e-commerce customer on the customer computer (col 10, lines 15-20; col 15, line 65-col 16, line 7; col 13, lines 40-46).

Claims 4, 13, 20, 24, 29: Angles, Gerace, and Dedrick disclose the system, method, server, medium of claims 1, 10, 17, 21, 26, and Angles further discloses that the identity of the personalized content corresponds to an executable file to be executed by the customer computer (col 6, line 65-col 7, line 10; col 7, lines 60-66; col 15, line 65-col 16, line 15; col 7, line 60-col 8, line 8; col 8, lines 15-20).

Claims 5, 14: Angles, Gerace, and Dedrick disclose the system and method of claims 1, 10, and Angles further discloses that the content management server identifies the personalized content via a table lookup operation in which the identity of the e-commerce customer serves as an index (col 15, line 65-col 16, line 15; col 16, lines 15-25). Additionally, Gerace discloses the utilization of a table for tracking user information (col 2, lines 54-60) and that the table can be indexed or referenced by user identifier (Fig. 3b) and also the utilization of indexes (col 1, lines 23-29). It would be obvious to one skilled in the art to add Gerace's utilization of tables to Angles' extensive information on users in order to be better able to access user information.

Claims 6, 15, 25, 30: Angles, Gerace, and Dedrick disclose the system, method, server, medium of claims 1, 10, 21, 26, and Angles further discloses a data aggregation server that receives e-commerce customer information corresponding to the query from the content management server, the e-commerce customer information including the identity of the client, the identity of the e-commerce customer and the identity of the personalized content and storing

the customer information (col 3, lines 45-54; col 3, lines 54-60; col 2, lines 54-58; col 15, lines 20-31; col 15, line 65-col 16, line 7).

Angles further discloses that the e-commerce customer information includes the identity of the e-customer (col 3, lines 54-60), an audit of the personalized content (col 15, line 65-col 16, line 7), and storing customer information (col 3, lines 7-17; col 3, lines 55-65).

Angles further discloses the utilization of cookies on the user's computer to uniquely identify a consumer (col 17, lines 25-38; col 11, lines 1-5).

Angles does not explicitly disclose that the identity of the client is determined as apart from the identity of the consumer.

However, Gerace discloses that the identity of each user client as well as the user is determined (col 6, lines 13-21; Fig. 3C; col 6, lines 52-57; col 13, line 62-col 14, line 3).

Therefore, it would have been obvious to one having ordinary skill in the art at the time the invention was made to add Gerace's identifying the consumer and the client to Angle's identifying the user via information on the user's computer. One would have been motivated to do this in order to allow Angles to send appropriate content based upon the capabilities or limitations of the client computer.

Gerace further discloses a multitude of server and server clients (Fig. 1).

Angles further discloses a host of servers and a client-server architecture (col 5, line 61-col 6, line 15) and that a Web browser can act as a client (col 5, line 65-col 6, line 3).

Angles nor Gerace does not explicitly disclose that the specific identity of the client server servicing a customer is tracked.

However, Dedrick discloses that the client server serving a user is identified and tracked
(Fig. 1; col 2, lines 54-col 3, line 28; col 14, line 52-col 15, line 5).

Therefore, it would have been obvious to one having ordinary skill in the art at the time
the invention was made to add Dedrick's identifying the consumer and the client serving the
consumer to Angle's identifying the user via information on the user's computer. One would
have been motivated to do this in order to allow Angles to send appropriate content based upon
the client that serves a consumer.

Claim 7: Angles, Gerace, and Dedrick disclose the system of claim 6, and Angles further
discloses a personalization/segmentation database coupled to the data aggregation server, the
personalization/segmentation database storing e-commerce customer information for a plurality
of e-commerce customers (col 15, lines 20-31; col 16, lines 25-45).

Angles further discloses storing customer information for a plurality of e-commerce
customer of user groups (col 15, lines 31-43; col 16, lines 12-15; col 20, lines 53-63; col 4, lines
1-5).

Additionally, Gerace discloses storing customer information for a plurality of e-
commerce customer of user groups (col 20, lines 10-20; col 12, lines 25-30; col 13, lines 1-13;
col 19, lines 1-7; col 19, line 65-col 20, line 5).

Claim 8, 16, 31: Angles, Gerace, and Dedrick disclose the system, method, medium of
claims 7, 15, 30, and Angles further discloses:
a content management interface server coupled to the personalization/segmentation database and
to the content management server;

wherein the content management interface server supports the association of personalized

content to segments of e-commerce customers;

wherein the content management interface server creates an association of personalized

content with the segments of e-commerce customers;

wherein the content management interface downloads the association of personalized

content with the segments of e-commerce customers to the content management server (col 3,

lines 45-54; col 3, lines 54-60; col 2, lines 54-58; col 15, lines 20-31; col 15, line 65-col 16, line

7).

Angles further discloses storing customer information for a plurality of e-commerce

customer of user groups, targeting segments of e-commerce customers, and tracking segments of

e-commerce customers (col 15, lines 31-43; col 16, lines 12-15; col 20, lines 53-63; col 4, lines

1-5).

Additionally, Gerace discloses storing customer information for a plurality of e-

commerce customer of user groups, targeting segments of e-commerce customers, and tracking

segments of e-commerce customers (col 20, lines 10-20; col 12, lines 25-30; col 13, lines 1-13;

col 19, lines 1-7; col 19, line 65-col 20, line 5).

Claim 9: Angles, Gerace, and Dedrick disclose the system of claim 1, and Angles further

discloses:

the content management server comprises a plurality of separate server computers, each of which

services a particular set of queries (col 13, lines 35-46); and

the system further comprises a load balancing server coupled to the plurality of separate

server computers and to the data network, wherein the load balancing server routes queries to the

plurality of separate server computers (col 8, lines 20-33; col 13, lines 46-54; col 6, lines 4-15).

Claim 18: Angles, Gerace, and Dedrick disclose a downloadable web page as in claim 17,

and Angles further discloses receiving a response from the content management server including

the address of personalized content (col 15, lines 43-40; col 15, lines 22-25), retrieving the

personalized content (col 15, lines 28-31), and presenting the personalized content on the

customer computer (col 16, lines 14-15; col 15, lines 28-31).

Claims 32-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over Angles

(5,933,811) in view of Gerace (5,848,396) and in view of Dedrick (5,724,521) and in further

view of Courts (6,480,894).

Claim 32-36: Angles, Gerace, and Dedrick disclose the system, method, downloadable

webpage, server, medium of claims 1, 10, 17, 21, 26.

Angles further discloses locally stored session identifying and tracking information

(cookie) that has an expiration parameter in the form of expiration date (col 11, lines 5-40).

Angles does not explicitly disclose that the session ID is deemed expired when it is no

longer relevant to current browsing activity of the customer computer.

However, Courts discloses that the session ID is deemed expired when it is no longer

relevant to current browsing activity of the customer computer (col 7, lines 10-21). Note that

Courts discloses examples that the session ID is not relevant based on time that the user has been

idle.

Additionally, Courts discloses tracking user activity, profiling a user, targeting a user,

presenting customized content, and users making purchases (col 1, lines 37-47; col 2, lines 13-

16; col 2, lines 67-col 3, line 5; col 3, lines 45-50; col 4, lines 29-33; col 4, lines 46-col 5, line 5).

Therefore, it would have been obvious to one having ordinary skill in the art at the time

the invention was made to add Courts' relevant session ID to Angles tracking and profiling of

user session activities. One would have been motivated to do this in order to provide further

control over tracking user session that are relevant and in differentiating different user sessions.

(10)   *Response to Argument*

On page 1 of the Appellant's Appeal Brief dated 11/22/04, Appellant states that, 'it

appears that the Examiner has admitted that the prior amendment was sufficient to overcome all

of the references in the Office Action.' Examiner notes that a new grounds of rejection was

added to the Final Rejection dated 7/14/04 to address the new claims. Examiner stated this in the

Response to Arguments section on page 11 of the Final Rejection dated 7/14/04, "Applicant's

arguments with respect to claims 1-31 have been considered but are not found persuasive.

Applicant's arguments with respect to claims 32-36 have been considered but are moot in view of

the new ground(s) of rejection."

The following is in response Appellant's arguments beginning on page 7 of the Appeal

Brief concerning the rejection of independent claim 1.

In response to applicant's arguments against the references individually, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); *In re Merck & Co.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986).

It is the combination of Angles, Gerace, and Dedrick that discloses the Appellant's claimed invention. As stated above, Angles and Dedrick disclose locally storing and processing user tracking information. Gerace discloses the utilization of the session ID. Gerace's utilization of further user tracking via a session ID was added to Angles and Dedrick's user tracking and local storing of user tracking information. Also, as stated in the Final Rejection, Angles discloses the creation of user identifying information if none exists yet or the utilization of already present user identifying information when there is such. Also, note that Dedrick was added for further features on local operation of session tracking information. Dedrick was not added to demonstrate a session ID itself. Please see the rejection of Claim 1 above.

Also, in terms of claim 1, the feature of 'the session ID that is save. . .is expired' is not necessary because of the preceding 'or' statement. Hence, the session ID that expires is addressed with the prior art in claims 32-36 where a session ID that expires is directly claimed in the claims.

Examiner notes that while specific references were made to the prior art that a 35 USC 103(a) rejection was made and that it is actually also the prior art in its entirety and the combination of the prior art in its entirety that is being referred to. Hence, it is the combination of Angles, Gerace, and Dedrick that discloses the Appellant's claimed invention. Also, the

rejection of claim 1 details which specific features were deemed relevant from which prior art reference.

In response to applicant's argument that there is no suggestion to combine the references, the examiner recognizes that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)and *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

In response to arguments concerning the combination of Angles, Gerace, and Dedrick, each of Angles, Gerace, and Dedrick provide tracking, profiling, targeting, and e-commerce features (as stated in the Final Rejection of claim 1 above). Hence, the aims of the Angles, Gerace, and Dedrick references are relevant to each other. The configuration options of Angles, Gerace, and Dedrick cited in the Final Rejection are obvious combinations to a user skilled in the art with an objective of e-commerce and tracking, profiling, and targeting a user(s) utilizing a network. One would be motivated to combine the different features of Angles, Gerace, and Dedrick to expand and enhance the e-commerce and tracking, profiling, and targeting a user(s) utilizing a network capabilities.

In response to Appellant's arguments on page 10 that Angles, Gerace, and Dedrick do not disclose, 'downloadable personal content code that retrieves, creates, and communicates a session ID'. As noted above and in the Final Rejection also above, Angles and Dedrick disclose downloadable personal content code that retrieves, creates, and communicates user tracking

information. Gerace discloses that user tracking information can include the further features of a

session ID that can be utilized for user tracking.

In response to Appellant's arguments on page 9, that, "The USPTO suggests relocating

the session ID of the server. . .with one of the session managers of Dedrick". However, note that

in the Final rejection of claim 1 that Dedrick was utilized to demonstrate locally operated session

information tracking. Examiner notes that Gerace's session ID can be locally utilized as Angles

and Dedrick disclose user profiling, tracking, and information personalization operations locally.

One would be motivate to place session tracking on the local level for increased user privacy or

security.

Note that Angles discloses different configurations with locally stored user tracking

information (Fig. 4; Fig. 11), Gerace discloses the user utilizing the Internet anonymously (col

32, lines 52-57) and Dedrick discloses that information can not be placed on the server for user

privacy reasons (col 11, lines 45-50). Therefore, it would be obvious to one skilled in the art that

Gerace's session ID can be added to Angles and Dedrick's local user tracking operations for the

purposes of increased security or privacy.

Examiner further notes that the test for obviousness is not whether the features of a

secondary reference may be bodily incorporated into the structure of the primary reference; nor

is it that the claimed invention must be expressly suggested in any one or all of the references.

Rather, the test is what the combined teachings of the references would have suggested to those

of ordinary skill in the art. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981).

Also, it must be recognized that any judgment on obviousness is in a sense necessarily a

reconstruction based upon hindsight reasoning. But so long as it takes into account only

knowledge which was within the level of ordinary skill at the time the claimed invention was

made, and does not include knowledge gleaned only from the applicant's disclosure, such a

reconstruction is proper. See *In re McLaughlin*, 443 F.2d 1392, 170 USPQ 209 (CCPA 1971).

In response to arguments concerning independent claims 10, 17, 21, 26, please see the

Response to Arguments presented above concerning claim 1.

The following is in response to arguments concerning claim 2. Note that claim 2 does

not state any special features of the 'secondary identifier' other than that it relates to the client

and can be utilized for identifying personalized content. Angles discloses numerous other

identifiers that are related to the client and can be utilized for identifying personalized content

(col 15, lines 20-31; col 15, line 65-col 16, line 7). Also, note that in Angles the advertising

content can also be store locally (col 23, lines 27-35; Fig. 11, item 44). Hence, when the

advertising content is stored locally, it is implied that advertising utilization information would

come from a local source as well.

The following is in response to arguments concerning claims 5, 14. Angles discloses that

the user related information can be organized and looked up (col 15, line 65-col 16, line 15; col

16, lines 15-25). Gerace discloses the utilization of a table for tracking user information (col 2,

lines 54-60) and that the table can be indexed or referenced by user identifier (Fig. 3b) and also

the utilization of indexes (col 1, lines 23-29).

The following is in response to arguments concerning claims 6, 15, 25, 30. As to the

combination of Angles, Gerace, and Dedrick, please see the Response to Arguments above

concerning claim 1.

The following is in response to arguments concerning claim 7. Claim 7 states that the features distinguishing the personalization/segmentation database are 'storing e-commerce customer information for a plurality of e-commerce customers'. The rejection of the claims is based on the claimed invention as stated with the features disclosed in the claims. Please see the rejection of the claimed features of claim 7 as stated in the Final Rejection above.

Also, Examiner further notes that it is the Applicant's claims as stated in the Applicant's claims that are being rejected with the prior art. Although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims. See *In re Van Geuns*, 988 F.2d 1181, 26 USPQ2d 1057 (Fed. Cir. 1993). This note on the prior art combination addressing the claimed invention applies to all claims on appeal.

The following is in response to arguments concerning claim 8, 31. Appellant has not stated what specific features the Appellant believes are absent from the combination of the prior art used in the Final Rejection. Please see the rejection of claims 8, 31 as stated in the Final Rejection above.

The following is in response to arguments concerning claim 9. Appellant has not stated what specific features the Appellant believes are absent from the combination of the prior art used in the Final Rejection. Please see the rejection of claim 9 as stated in the Final Rejection above.

The following is in response to arguments concerning claim 18. Please see the rejection of claim 18 as stated in the Final Rejection above.

The following is in response to arguments concerning claim 20, 24. Angles discloses executable files downloaded to the customer computer and executable by the computer (col 6, line 65-col 7, line 10; col 7, lines 60-66).

The following is in response to arguments concerning claim 23. Please see the rejection of claim 23 as stated in the Final Rejection above.

The following is in response to arguments concerning claims 32-36 regarding the combination of Courts with Angles, Gerace, and Dedrick.

Examiner further notes that the test for obviousness is not whether the features of a secondary reference may be bodily incorporated into the structure of the primary reference; nor is it that the claimed invention must be expressly suggested in any one or all of the references. Rather, the test is what the combined teachings of the references would have suggested to those of ordinary skill in the art. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981).

In response to applicant's arguments against the references individually, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); *In re Merck & Co.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986).

Courts was combined with Angles, Gerace, and Dedrick not for Courts disclosing local processing but, rather, for Court's disclosure of an expiring session ID. Angles and Dedrick were referenced for local processing of user targeting, profiling, tracking, information customization, and user purchasing. Courts was added to Angles and Dedrick as a further way of tracking user activity. Additionally, Courts discloses tracking user activity, profiling a user, targeting a user, presenting customized content, and users making purchases (col 1, lines 37-47;

col 2, lines 13-16; col 2, lines 67-col 3, line 5; col 3, lines 45-50; col 4, lines 29-33; col 4, lines 46-col 5, line 5). Hence, Courts' disclosure is relevant to the aims of Angles, Gerace, and Dedrick and Courts provides further tracking features to the Angles, Gerace, and Dedrick combination.

For the above reasons, it is believed that the rejections should be sustained.
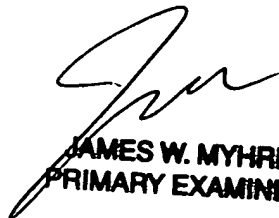
Respectfully submitted,

January 5, 2004

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